

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA**

M.D., a minor child, and Melodie Shuler,  
as a parent and next friend of M.D., a  
minor child,

Plaintiff,

v.

School Board of the City of Richmond,  
Sheleta Crews, individual and official  
capacities, Raymond Bowser, individual  
and official capacities,

Defendants.

Case No. 3:13-cv-329 - HEH

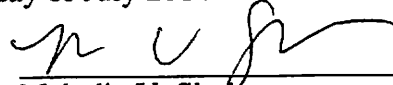
**MOTION FOR APPOINTMENT OF COUNSEL  
OR IN THE ALTERNATIVE MOTION FOR EXTENSION OF TIME  
(an additional 60 days) to RETAIN COUNSEL**

The plaintiff, Melodie Shuler, respectfully request this Honorable Court to appoint counsel for her minor son or allow an additional 60 days to retain counsel pursuant to . The plaintiff alleges that due to unforeseen circumstances of medical illness that has interfered with Ms. Shuler's ability to work and being displaced without a residence due to a house fire and an illegal eviction she and her families status has not changed since this case was filed and the unforeseen circumstances has resulted in a present inability to pay for counsel. However, there is a possibility to obtain the ability to pay for counsel within two months.

Ms. Shuler also requests this Court to interpret the Court of Appeals decision in which it holds that a non-attorney parent cannot represent their children. Ms. Shuler asks whether or not it applies to parents who are not admitted in the Eastern District of Virginia or does it apply to her because Ms. Shuler is an attorney licensed to practice in the United States District Court of

the District of Columbia ( six years), the State of Maryland (12 years) and the District of Columbia (10 years).

Respectfully submitted,  
Dated this 7<sup>th</sup> day of July 2014

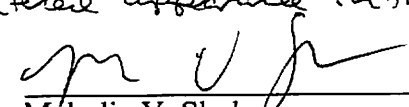


Melodie V. Shuler  
1836 North Capitol Street  
Washington, D.C. 20001  
804-332-4538  
melodieshuler@yahoo.com

**CERTIFICATE OF SERVICE**

~~I hereby certify that a copy of this Motion for Extension of Time to Complete a Initial Discovery was mailed this 7<sup>th</sup> day of July 2014 by pre-paid postage upon~~

I called the clerk's office on July 2014 and  
was informed that no attorney has entered appearance in this  
case.

mailed this motion to the   
School Board, Shelata Crews  
and Raymond Louser on July 7, 2014 to  
301 North 9<sup>th</sup> Street  
Richmond, VA 23219.